



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

ELIZABETH DOLLIN
Deputy Chief
212-356-3525
edollin@law.nyc.gov

January 25, 2018

VIA ECF

Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Roberto Arroyo v. City of New York, et al.,
15-CV-0917

Your Honor:

I am a Deputy Chief in the Special Federal Litigation of the New York City Law Department. For the reasons set forth herein, defendants respectfully request a one week extension of the time – from January 26, 2018 to February 2, 2018 – by which the parties must submit motions *in limine* in connection with the trial of this matter which is scheduled for March 5, 2018¹. This is defendants' first request for an extension of time by which to file the motions *in limine* and plaintiff's counsel, Amy Rameau, consents to this request.

This brief extension is required because a major life event for Karl Ashanti, the ACC defending this matter, occurred yesterday. For privacy reasons, that event is not identified herein; however, plaintiff's counsel has been made aware of the nature of event and, should the Court so request, the undersigned would be happy to inform the Court of same.

¹ This office is mindful of Your Honor's Individual Practice Rules which require that a request for an extension of time must be made two business days prior to the deadline, however, the reason necessitating this request did not occur until late yesterday afternoon at which time the undersigned immediately reached out to plaintiff's counsel to obtain her consent; however, because of scheduling issues, Ms. Rameau was unable to respond until this afternoon.

Defendants thank Ms. Rameau for courtesies extended and the Court for its consideration herein.

Respectfully submitted,

/s/

Elizabeth Dollin

By ECF:

Amy Rameau, Esq.

Plaintiff's Attorney